

RESPONSE TO COMMENTS:

Since most of the comments are lengthy and apply to more than one emission unit, the permit writer will not rewrite the comments. A copy of the comments is attached.

Source Summaries

The permit has a description for each emission point or group of emission points. The description helps the Division's inspectors identify changes made to the emission point since the issuance of the permit. Furthermore, if the source is to make changes to a certain emission point, the source is required to submit a permit application to the Division. The Division will review the application and make a determination whether the change can be treated as an administrative amendment, or it requires a minor or a major modification to the permit. These will remain unchanged.

Opacity Testing

The permit requires GE to perform qualitative visual observations of the opacity on weekly basis. This requirement is necessary to ensure continuous compliance with the opacity limits. The Division feels that the requirement is not burdensome, since it does not require a certified visible emission reader to perform. GE is required to perform a U.S.EPA reference method 9, only if opacity is perceived or believed to exceed the standard.

Compliance Demonstration Method

GE is not the only source where the actual emissions are well below the allowables. Also, the permit does not require that GE perform the calculation listed in the compliance demonstration method. The calculation is listed for the inspector, or GE, to determine if GE is in compliance.

Emission points 37(F4), Line # 3 Forehearth and 40(L3), Line # 3 Lehr, both have a NO_x limit of 1.6 tons/yr. To show continuous compliance the compliance demonstration method had a mathematical equation to determine the emissions on daily basis. The Division agrees with GE that the requirement to show compliance on daily basis is unreasonable and shall be replaced with a monthly requirement.

Emission Factors

The Division did not use numerical values for emission factors to avoid opening the permit if GE decides to stack test and revise some of these emission factors. In that case the change will only be made to KY emission inventory system.

New Source Standards

Construction Permit C-87-129, addressed the modifications to be made to the glass furnace, raw materials handling and mixing operations, and the addition of line # 3. The new particulate emissions allowables for all the emission units in the materials handling and mixing area are to preclude the applicability of PSD.

Insignificant Activities

All these emission units that GE is requesting to move to Section C-Insignificant Activities, have been permitted with allowables to preclude the applicability of PSD. PSD is not a generally applicable requirement. Therefore, they cannot be moved to Section C.

Self-Imposed Emission Limits

Emission limits that were self-imposed used to preclude the applicability of PSD shall remain in the permit as stated.

Specific Permit Provision Comments

13 (BM-6) Furnace Charge Bins

Emission Limitations

Emission unit 13, Furnace charge bins, never showed up on any of the previous permits. Therefore, the Division will change the applicable regulation from 401 KAR 59:010 to 401 KAR 61:020.

11 (F1) The glass and refiner

Testing Requirements

Monitoring the field by field voltage and electric current reading, in addition to the total electrical power to the ESP, is necessary to ensure proper operation of the control equipment. Furthermore, the NO_x monitor audit provisions are in agreement with 40CFR60, Appendix F requirements, and does not need any modification.

Specific Monitoring Requirements

GE requested the self-imposed NO_x limitation to preclude the applicability of PSD, and the CEM was required by the Division to ensure that the limitation was met. It is a reminder to the source and to the Division's inspectors that the CEM along with any emission monitoring devices will be used for enforcement purposes.

Specific Record Keeping Requirements

401KAR50:035, Section 7(1)(d)2. states that records shall be kept for a five year period and is written in the permit at Section F, 2.

14 (RB1), 21 (RB2), and 38(RB3) Line numbers 1, 2, and 3 Ribbon Machines

These emission units cannot be placed in the Insignificant Activities section, because they have particulate matter allowables to preclude the applicability of PSD.

37 (F4) Line #3 Forehearth

Specific Record Keeping Requirements

The Division agrees with GE and will remove the last statement in this subpart.

36 (H8) North American Boiler

Emission Limitations

The Division recognizes that the boiler burns natural gas only. However, 401 KAR 59:015, specifically states that natural gas fired boilers shall have an SO₂ limit.

Specific Monitoring Requirements

See comment under emission limitations.

44 (Y25) Waste Water Treatment

This emission unit was permitted on August 15, 1989. Therefore, it was subject to 401 KAR 63:022, and not 63:021. However, the toxic regulations were repealed on January 19,1999, and 63:020 became the effective regulation. Emission unit 44 will be moved to Section C-Insignificant Activities.

24 (CR1) Hard Chromium Electroplating, Stripping, Vapor Hone and Rinsing

Applicable Regulations

The sand blasting unit is the only reason this emission unit is subject to process regulations. However, the sand blasting unit is considered an insignificant activity. Therefore, the process operation regulation doesn't apply to emission unit 24.

Operating Limitations

Including the entire text of work practice standards in the permit helps the Division's inspectors in performing their duties.

Specific Monitoring Requirements

See response under operating limitations.

With regard to daily inspections of the scrubbers, these limits were enforced in previous permits and GE has been complying with them. The Division feels that the daily inspections are necessary and shall remain in effect. These inspections are necessary to ensure proper operation of scrubbers.

Specific Control Operating Conditions

See response to specific monitoring requirements.

29 (AE-1) Acid Etching and Reclaim Area

Applicable Regulation

This emission unit has been permitted before, and has a particulate matter allowable to preclude the applicability of PSD.

Operating Limitations

The reclaim cookers will be removed from the permit since GE has decided to take them out.

Emission Limitations

The PM₁₀ limit is to preclude the applicability of PSD, therefore, it cannot be removed.

Specific Control Equipment Operating Conditions

The 25 hp scrubber will be removed from the permit.

The requirements under this subpart are to ensure continuous compliance.

Group Requirements (I), (II), and (III)

Emission Limitations

The compliance demonstration method prescribed in the permit shall remain in force, because it is a straight forward method of showing compliance with the limits.

Specific Monitoring Requirements

The monitoring requirements under this subpart are to satisfy the periodic monitoring requirements of U.S.EPA.

Section C

Even though these are insignificant activities, they still have to comply with any applicable regulations and perform some minimal level of periodic monitoring.

If GE makes changes or modifications to these emission units, a permit application shall be submitted to the Division to determine if the change or modification requires a permitting action, see 401 KAR 50:035, Section 1(3) and Section 14.

Section D

The Division agrees with GE and will remove this Section.

Section E

Control Equipment Requirements

Requiring GE to maintain and operate any affected facility including any associated air pollution control equipment in a manner consistent with good air pollution control practice, does not establish new and more stringent emission limits beyond those required in this permit, and the Division will not change this language.

Section F-Monitoring, Record Keeping and Reporting Requirements

The Division disagrees with GE about combining conditions 1 and 2. Because one addresses monitoring requirements, while the other addresses record keeping.

Condition No. 2 does not specify that data cannot be retained in electronic format, nor does it specify that data shall be kept on site. GE is responsible for keeping records required by the Division in accordance with the requirements of this permit.

Condition 5 states that GE has the option to request reporting monitoring data based on a calendar year. The Division believes condition 6(a), as stated in the draft permit, does incorporate all of the provisions of 401 KAR 50:055, Section 1.

The most recent copy of the draft permit that was sent to GE does not use the word “promptly”.

The Division disagrees with GE’s interpretation of condition 7 of this section and does not believe that it should be changed.

Condition 8, “subject emissions” is the same as actual emissions. The report shall be submitted within thirty (30) days of the date this information is mailed. See 401 KAR 59:035, Section 23(1).

The permit requires GE to perform qualitative visual observations of the opacity on weekly basis. This requirement is necessary to ensure continuous compliance with the opacity limits. The Division feels that the requirement is not burdensome, since it does not require a certified visible emission reader to perform. GE is required to perform a U.S.EPA reference method 9, only if opacity is perceived or believed to exceed the standard.

Section G-General Conditions

The Division believes that the language in general condition 1 is very clear and does not require any modification.

The Division believes that condition 3 is adequate as stated in the draft permit. However, the insertion of the applicable regulation cite is acceptable.

The Division believes that condition 4 is adequately stated in the draft permit and does not need any modification.

The Division agrees and has removed condition 5.

The Division believes the wording of conditions 7 and 9 conform with the wording of the applicable regulations, and the conditions are not revised.

The Division believes that condition 15 is correct and it will not be changed.

The list of non-applicable regulations is only appropriate for those regulations that may appear to be applicable, not a listing of all non-applicable regulations.